

## REMARKS

Applicant respectfully traverses and requests reconsideration.

As an initial matter, claims 1, 12, 15, 19, 23, and 28 have been amended to correct various typographical errors. Applicant respectfully submits that these amendments are believed to be as to form only. The Specification has also been amended to correct various typographical errors. Applicant respectfully submits that no new matter has been added to the present disclosure by these amendments.

Claims 1, 4-9 and 11-15, 17-20, 22-23 and 26-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Cheng et al. in view of Venkatesan in further view of Thawte's "Web Server Certificates: 3.x Root Rollover".

As to claim 1, Applicant respectfully notes that Cheng fails to teach, inter alia, automatically redirecting communication from the first processing entity and the second processing entity to the first processing entity and a third processing entity, under control of the second processing entity, in response to detecting the need to update data. The Office Action appears to have equated Cheng's client computer with the claimed first processing entity, Cheng's service provider computer system and the database therein with the claimed second processing entity, and Cheng's software vendor computer system with the claimed third processing entity. As noted in the cited portion of Cheng, applicable software updates are determined by the client computer itself (page 10, lines 3-4) and identified to a user of the client computer. The user selects updates to install from among those identified. After the user selects updates to install, either the client application or the service provider computer uses the network location specified in the database of software updates to connect to the software vendor computer system and download the associated software updates to the client computer (page 3, lines 37-

39). Thus, the cited portions of Cheng do not teach any automatic redirection of communication from one set of processing entities to another. That is, because in Cheng the determination of applicable software updates occurs within the client computer itself (page 10, lines 3-4). No communication occurs between the first processing entity (i.e., the client computer) and the second processing entity (i.e., the database of software updates) during this determination. Accordingly, the subsequent establishment of communication between the first processing entity and the third processing entity (i.e., the software vendor computer system) to download the selected updates is not a redirection of communication. For the sake of argument, Applicant further respectfully notes that even if this establishment of communication between the first processing entity and the third processing entity were characterized as a redirection, it still would not be automatic; after the applicable updates have been identified, the user must still "[select] various software updates for installing on the client computer" before any such "redirection" and establishment of communication with the software vendor computer system would occur.

Applicant respectfully submits that the above deficiencies of Cheng alone render claim 1 in condition for allowance. However, to expedite prosecution, Applicant further notes that the Office Action has cited Venkatesan as teaching providing update complete data which is different from the updated data, under control of the third processing entity, for the second processing entity. Venkatesan is directed to a technique for generating an authentic cryptographic signature message and for authenticating such a signature. As noted on page 3 of the response filed May 11, 2005, the cited portion of Venkatesan teaches that if a client computer establishes an Internet connection to the website of a product manufacturer, a web server can generate an installation number, or indicia, and download that number for storage to the client computer. The installation number can then be used by the manufacturer to uniquely and

securely identify the installation when the client computer accesses a web site of the manufacturer. Applicant initially notes that the cited portion of Venkatesan thus appears to teach only two, not three, processing entities; that is, the client computer and the web server of the manufacturer. The Office Action has cited Venkatesan's "vender" (Office Action, page 3), i.e. manufacturer, as being the third processing entity, and a "vender related service provider" (Office Action, page 3) as being the second processing entity. Applicant respectfully submits that the "vender" alone is not a processing device or processing entity, unlike, for example, a computer operating as a web server. As such, Venkatesan cannot teach providing update complete data which is different from the updated data, under control of the third processing entity, for the second processing entity, because Venkatesan only appears to teach two processing entities. Indeed, the Office Action has cited Venkatesan's "cookie communication of successfully updated/installed software" on page 3 as teaching this limitation. However, Applicant notes that, aside from the fact that the cookie communication is not of successfully updated/installed software and instead is of an installation number itself (col. 14, lines 45-48 and 53-56), this communication occurs from the web server to the client computer. As such, it is data provided for the client computer. Claim 1 requires that update complete data be provided for the second processing entity. As the Office Action has already equated the second processing entity with Venkatesan's "vender related service provider" (page 3), Applicant respectfully submits that the data provided is not "for the second processing entity" as required.

For at least the above reasons, Applicant respectfully submits that Venkatesan also fails to teach what is alleged in the Office Action.

The Office Action further cites Thawte as demonstrating "[publishing] notices and [requiring] update of web browsers based upon root [CA] certificates" (Office Action pages 3

and 10), and asserts that it would have been obvious to one of ordinary skill in the art at the time of the invention to implement the system of Cheng, which admittedly does not relate to root certificates, with updating browsers and certificates as new certificates become available as found in Thawte's teaching. Notwithstanding Cheng's other deficiencies as discussed above, Applicant respectfully submits that Cheng teaches that a client computer automatically detects applicable software updates (page 3, lines 31-36) while Thawte teaches that a user must manually navigate to a designated URL in a written page to obtain updated root CA certificate data. In fact, the Thawte reference states that the browser does not check any root certificate expiration dates. The entire system of Thawte is directed to manual updating of root CA certificate data, from the manual navigation to a designated URL to manual installation of the new certificate data. The actual combination of these two teachings would simply lead to a system having automatic detection of applicable software updates, automatic installation of those software updates chosen by a user as taught by Cheng, and the capabilities for manual updating of root CA certificate data by a user as taught by the Thawte article. The combination of these disparate features cannot amount to the claimed invention.

For at least all of the above reasons, Applicant respectfully submits that claim 1 is in condition for allowance.

As to claim 12, Applicant respectfully reasserts the relevant remarks made above with regard to claim 1, and as such this claim is also in condition for allowance.

As to claim 23, Applicant respectfully reasserts the relevant remarks made above with regard to claim 1 and further notes that Cheng, inter alia, does not teach a system comprising a web server (or any other type of processing entity) operative to detect a need to update web certificate data based on a request for connection from a web browser (or any other type of

processing entity). Cheng - in particular, page 3, lines 31-36 – teaches that the need for updates is determined in the following manner: a client application downloads part of a service provider computer system's database of software update information to the client computer, and the client application then determines, from the client database, which software updates are applicable or relevant to the user's computer. It appears that the "client database" refers to the portion of the database of software updates that has been downloaded to the client computer. Accordingly, Applicant respectfully submits that while the client computer does communicate with the database of software update information, it does not do so during any determination of a need for updates to the client computer. It does so to download part of the database of software updates, but the subsequent determination of whether or not the client computer requires any of those updates to be installed occurs solely within the client computer, and this determination is not made by a web server or any other processing entity. As noted on page 10, lines 3-4, "In the preferred embodiment, the analysis [of installed software products and determination of applicable updates] is preferably performed by the client application . . . on the client computer." (Emphasis added). Additionally, in view of the discussion hereinabove regarding Cheng's failure to teach both automatic redirection of communication and a second processing entity that detects the need to update data for a first processing entity, Cheng necessarily fails to teach the requirement of claim 23 that such a redirection occurs by a web server (or any other processing entity) sending to a web browser (or any other processing entity) a universal resource locator associated with the web certificate update controller (or any other processing entity) to which the web browser's communication is being redirected. For at least these reasons, Applicant respectfully submits that claim 23 is in condition for allowance.

As to claim 28, Applicant initially respectfully reasserts the relevant remarks made above with regard to claim 1. Additionally, in view of the discussion hereinabove regarding Cheng's failure to teach both automatic redirection of communication and a second processing entity that detects the need to update data for a first processing entity, Cheng necessarily fails to teach the requirements of claim 28 that such a redirection occurs by a web server (or any other processing entity) sending to a web browser (or any other processing entity) a universal resource locator associated with the processing entity to which the web browser's communication is being redirected. For at least these reasons, Applicant respectfully submits that claim 28 is in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter. For example, but not by way of limitation, claim 6 requires that detecting a need to update data includes determining whether a connection request between the first processing entity and the second processing entity includes a cookie associated with the second processing entity. The Office Action has cited Venkatesan, column 14, lines 53-56 as teaching this limitation. However, as noted on page 10 of the response filed January 24, 2003, the cookie taught by Venkatesan is merely a representation of the installation number that is communicated to the client computer. The cookie is not used to determine whether to update data. Accordingly, and as depending from allowable base claim 1, claim 6 is in condition for allowance.

Additionally, claim 7 requires in part that the method of claim 1 includes determining whether a certificate update should occur for the first processing entity based on whether cookies have been received by the first processing entity from the second and third processing entities. The Office Action has cited Cheng, page 3, lines 14-48; Cheng, page 17, lines 20-30 and 49-55; Venkatesan, col. 14, lines 54-56; and Venkatesan, col. 15, lines 7-15 as teaching this limitation.

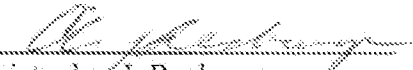
However, Applicant respectfully submits that the cited portions of these references appear silent as to the above claim limitation. Instead, these cited portions teach: a summary of how software updating occurs in Cheng's system, but with no mention of cookies to determine if updating should occur (Cheng, page 3, lines 14-48); the registration of new users to a service provider computer and the use of a data store describing the present operation of a client application, but which is not used to determine if updating should occur (Cheng, page 17, lines 20-30 and 49-55); a cookie that merely represents the installation number that is communicated to a client computer, and is not used in the process of determining if any update should occur (Venkatesan, col. 14, lines 54-56); and a discussion of different kinds of information for which authentic signatures may be generated (Venkatesan, col. 15, lines 7-15). Accordingly, and as depending from allowable base claim 1, claim 7 is in condition for allowance.

Claim 9 requires that automatically redirecting communication from the first processing entity further includes sending, by the second processing entity, a uniform resource locator of the third processing entity, to the first processing entity in response to the second processing entity detecting the need to update data for the first processing entity. The Office Action has cited Cheng, page 3, lines 23-25 as teaching this limitation. Applicant respectfully reasserts the remarks made with regard to claim 23 and notes that, in view of Cheng's failure to teach both automatic redirection of communication and a second processing entity that detects the need to update data for a first processing entity, Cheng must also fail to teach the above limitation of claim 9 in which the second processing entity sending a URL is part of such an automatic redirection process. As such, and as depending from allowable base claim 1, claim 9 is in condition for allowance.

Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

Date: 1/10/07

By:   
Christopher J. Reckamp  
Registration No. 34,414

Vedder, Price, Kaufman & Kammholz, P.C.  
222 N. LaSalle Street  
Chicago, Illinois 60601  
Phone: (312) 609-7599  
Fax: (312) 609-5005  
Email: creckamp@vedderprice.com